

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL,

*Plaintiff,*

v.

No. 22 Civ. 10016 (LAK)

DONALD J. TRUMP,

*Defendant.*

**DECLARATION OF ROBERTA A. KAPLAN IN  
SUPPORT OF PLAINTIFF E. JEAN CARROLL'S  
MOTION TO EXCUSE JUROR NO. 77**

I, Roberta A. Kaplan, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a member of the bar of the State of New York and am admitted to appear before this Court. I am a partner in the law firm Kaplan Hecker & Fink LLP, counsel for Plaintiff E. Jean Carroll in the above-captioned action.

2. I respectfully submit this declaration in support of Carroll's motion to excuse Juror No. 77 for cause.

3. Attached hereto as **Exhibit A** is a true list of all videos created by Tim Pool and posted on YouTube on his Timcast IRL channel in the past six months.

Dated: New York, New York  
April 30, 2023

  
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Roberta A. Kaplan